

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

Morton S. Bouchard, III,
Individually and as Co-Trustee for
The Morton S. Bouchard, III
Family Trust;

Plaintiff,

v.

David R. Jones, Elizabeth Carol Freeman, Jackson
Walker, LLP, Kirkland & Ellis, LLP, and Kirkland &
Ellis International, LLP, Portage Point Partners, LLC
and Matthew Ray,

Defendants.

Civil Action File
No. 4:24-cv-693

Jury Trial Demanded

To the Honorable Alia Moses,
Chief United States District Judge:

**STIPULATION OF PARTIAL VOLUNTARY DISMISSAL PURSUANT TO FED. R.
CIV. P. 41(a)(1)(A)(ii)**

IT IS HEREBY STIPULATED AND AGREED by and between Defendants Portage Point Partners, LLC and Matthew Ray, and their respective counsel, and Plaintiff, and his respective counsel, that the above-captioned action is voluntarily dismissed, with prejudice against Defendants Portage Point Partners, LLC and Matthew Ray pursuant to the Federal Rules of Civil Procedure 41(a)(1)(A)(ii). As the sole consideration for such dismissal, Defendants Portage Point Partners, LLC and Matthew Ray agree to file a motion, on or before September 4, 2024, permanently withdrawing their Motion for Sanctions Pursuant to Rule 11 (at Docket Entry 45).

/s/ Mikell A. West
Counsel for Plaintiff

Dated: September 3, 2024

/s/ Mike Lynn
Counsel for Defendant Portage Point Partners, LLC and Matthew Ray

Dated: September 3, 2024